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JM

IN THE MATTER OF U S WEST )  
COMMUNICATIONS, INC.'S )  
COMPLIANCE WITH SECTION 271 ) DOCKET NO. T-00000A-97-0238  
OF THE TELECOMMUNICATIONS )  
ACT OF 1996 )

**REPLY OF THE COMMISSION STAFF  
TO THE COMMENTS ON THE STAFF INTERIM REPORT**

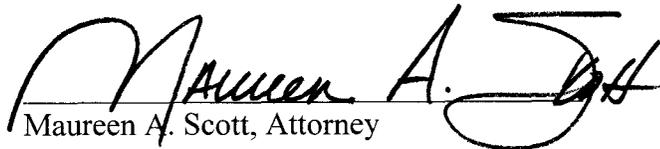
On May 4, 2000, the Arizona Corporation Commission ("Commission" or "ACC") Staff filed its Interim Report on the changes recommended by U S WEST Communications, Inc. ("U S WEST"), AT&T Communications of the Mountain States, Inc. ("AT&T") and MCI Worldcom, Inc. ("MCIW") to the Arizona Master Test Plan ("MTP"). In accordance with the December 3, 1999 Procedural Order, the Commission Staff submits this reply to the comments of MCIW on the Staff's Interim Report.

Staff agrees with MCIW that a more precise definition of UNE-P is required in the MTP, specifically Appendices B and E. MCIW Comments at p. 3. It is Staff's understanding that U S WEST has recently agreed to use, for Arizona OSS testing purposes, the definition utilized by the U S WEST Regional Oversight Committee ("ROC") in its thirteen state testing effort. Staff will instruct the Test Administrator to incorporate the ROC definition of UNE-P in both Appendices B and E of the MTP.

MCIW's final comment is that the full production line of UNE-P: new, disconnect, conversion "as is", conversion "as specified" and conversion with "directory listing change(s)(DL)" should be added to Appendix A of the MTP. MCIW Comments at p. 2. ACC Staff is hesitant to

1 make changes to Appendix A of the MTP when there is a process contained in the MTP itself  
2 (Article 2.2.4) to do this of which MCIW has not yet availed itself. Article 2.2.4 specifically  
3 provides for such additional tests and for the development of new test scenarios upon request of any  
4 participant. (See Exhibit A attached). Under the process set out, the Test Administrator will evaluate  
5 the request and will either recommend its inclusion or rejection to the TAG. The TAG will then  
6 attempt to reach consensus on the proposal. If consensus cannot be reached, the matter is escalated  
7 to the ACC Staff /DCI for resolution. If MCIW is not satisfied with the outcome through the TAG  
8 process, it always has the option of escalating any disputes to ACC Staff/DCI and the Hearing  
9 Division. Staff, therefore, recommends that MCIW first avail itself of the process set out in the  
10 MTP for the addition of these new test scenarios.

11 RESPECTFULLY submitted this 19th day of May, 2000.

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27 COPY of the foregoing mailed  
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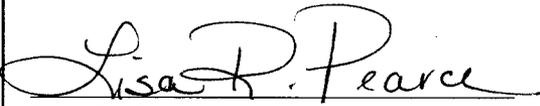
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#### 2.2.4 Additional Tests

It is recognized that unplanned troubles and other events may occur during the test period, which will indicate the need for Test Scenarios not already included in the Master Test Plan. To accommodate this eventuality the following process steps will be followed:

- a. Any participant may initiate a request for a new Test Scenario during the test period.
- b. The initiator documents the request in a format to be provided by the Test Administrator, and submits it to the Test Administrator, with copies to all participants.
- c. The Test Administrator evaluates the request and recommends its inclusion or rejection to the TAG.
- d. The TAG attempts resolution by consensus.
- e. If resolved in this manner, the Test Administrator implements this resolution and notifies all participants.
- f. If not resolved, the TAG escalates the request to the ACC Staff for decision.
- g. The ACC Staff reaches a decision and notifies participants.
- h. New Scenarios introduced during the test period will be tested in a manner which will not extend the overall test timeline unless recommended by the TAG and approved by the ACC Staff.

#### 2.2.5 Section 271 Web-site

A web-site will be established for the Arizona Section 271 test. The web-site shall be a repository for information related to the test and U S WEST's Section 271 application.

### 2.3 Document History

The Master Test Plan is a map for how the Arizona OSS tests will be conducted. The MTP lists Test Scenario level detail and other high level requirements describing how tests will be conducted in Arizona. The 271 Test Standards document developed by the Test Administrator provides detailed Test Cases within the Scenarios, Scripts and other exact specifications as to how the Arizona tests will be conducted.

Drafts of the MTP were circulated to interested parties and reviewed in workshops and TAG meetings hosted by the ACC. See Document Milestones,